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7 EIN Cap, Inc., Russell Naftali and Gene
Slavin

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9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 IT'S MY SEAT, INC, a California
12 corporation; VAHE SHAHINIAN, an
13 individual

14 Plaintiffs,

15 vs.
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17 HARTFORD CAPITAL LLC, a
18 Limited Liability Company; KEVIN
WOODLEY, an individual; EIN
19 CAP, INC., a New York Corporation;
20 RUSSELL NAFTALI, an individual;
21 GENE SLAVIN, an individual; and
DOES 1 through 100, inclusive,

22 Defendants.
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CASE NO.: 2:22-cv-02192-ODW-AFM
[Assigned to Hon. Otis D. Wright, II]

Related case:
Case No. 2:20-cv-06378-ODW-AFM

STIPULATION TO EXTEND TIME
WITHIN WHICH TO HAVE MOTION
FOR SUMMARY JUDGMENT HEARD.

Pretrial Conf. Date: 5/21/25
Trial Date: 6/10/25

1 **PLEASE TAKE NOTICE** that all parties agree to extend the time within
2 which to have their motion for summary judgement to be heard up to and including
3 April 31, 2025, or to such other date as the Court may set or continue the Summary
4 Judgment Motion for hearing.

5 Good cause exists for this extension because the parties just received the
6 transcript of the deposition of Plaintiff Vahe Shahinian on March 5, 2025 and the
7 deposition transcript of Defendant Russell Naftali on March 5, 2025. All parties
8 need time to review the transcript to determine if there is testimony therein which
9 needs to be cited or addressed in their respective moving papers. The present
10 motion completion date of March 31, 2025, does not allow for the giving of the
11 requisite 35-day notice of motion for the summary judgment.

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14 Dated: March 7, 2025

PARK & LIM

15 By: /s/ S. Young Lim
16 S. YOUNG LIM
17 JESSIE Y. KIM
18 Attorney for Defendant EIN Cap, Inc.

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20 Dated: March 7, 2025

WHITE & WILLIAMS LLP

21 By: /s/ Shane Heskin
22 SHANE HESKIN
23 Attorney for Plaintiffs Its My Seat and
24 Vahe Shahinian